STATE OF CONNECTICUT DEPARTMENT OF PUBLIC HEALTH BUREAU OF HEALTHCARE SYSTEMS

In re: Mary Sutton Hagan, R.N.

Petition No. 2004-1216-010-106

STATEMENT OF CHARGES

Pursuant to the General Statutes of Connecticut, §§19a-10 and 19a-14, the Department of Public Health (hereinafter "the Department") brings the following charges against Mary Sutton Hagan, R.N.:

- 1. Mary Sutton Hagan of West Simsbury, Connecticut (hereinafter "respondent") is, and has been at all times referenced in this Statement of Charges, the holder of Connecticut registered nursing license number R56353.
- 2. On August 15, 2001, the Connecticut Board of Examiners for Nursing (hereinafter "the Board") issued a Memorandum of Decision in Petition Number 2001-0312-010-014 (hereinafter "Memorandum") that placed respondent's license on probation in part as a result of respondent's diversion of hydromorphone, codeine and oxycodone. In July 2003, the Memorandum was modified to extend respondent's probation for an additional two years as a result of respondent's use of alcohol and Ambien in violation of her probation.
- 3. Said Memorandum specifically provides, in part, that respondent shall submit to random urine screens during the period of respondent's probation, and that all such screens shall be negative for the presence of alcohol and drugs.
- 4. On September 21, 2004, respondent tested positive for butalbital.
- 5. Respondent's conduct as described above constitutes violations of the terms of probation as set forth in the Memorandum, and subjects respondent's license to revocation or other disciplinary action authorized by the General Statutes of Connecticut, §§19a-17 and 20-99(b).

THEREFORE, the Department prays that:

The Connecticut Board of Examiners for Nursing, as authorized by the General Statutes of Connecticut, §§20-99(b) and 19a-17, revoke or order other disciplinary action against the license of Mary Sutton Hagan as it deems appropriate and consistent with law.

Dated at Hartford, Connecticut this ______ 28th day of <u>Lecember</u> 2009.

Marianne Horn, Director

Division of Health Systems Regulation